I have seen several comments in support of RM-10352. The issues fall into several categories;

1. Interference to weak signal narrow band and experimental modes of operation.

1A. The proposed rule making will unequally favor narrow band modes over experimental wider bandwidth modes because wideband modes would still be subject to interference from narrow band modes.

1B. If separation of narrow band and wide band modes is truly a solution why should the narrow band modes still be allowed to operate on the rest of the band?

2. RM-10352 should be enacted because other bands are partitioned similarly to the rule making proposal.

2A. The existing CW ("narrow band") sub bands are classic examples of the failure of the partitioning process. Amateur operators in other areas of the world where such restrictions are not in place are sought after by US operators. The US operators are forced to operate "split", transmitting on one frequency and listening on another. This significantly increases the risk of inadvertent interference.

3. The proponents of RM-10352 infer that CW and narrow band operations are somehow better and more vital to advancing the state of the art. This is a fabrication.

3A. The truly state of the art narrow band digital mode operation is conducted in very narrow bandwidths I have never found it a problem to find a place to operate PSK31, even during a CW contest. The exclusive use of a major portion of the 160M band by such operation is unnecessary.

3B. CW is declining in use on the amateur bands as a percentage of total use. One has only to tune the 160M band at any time other than a CW contest to confirm this.

These are a few of many points raised by supporters of this rulemaking proposal. My overall response is this rulemaking proposal is simply a grab to obtain exclusive use of a frequency segment by a relatively small faction at the expense of every one else. Creating such exclusive areas is not a way to welcome new operators and retain the existing pool of operators.